



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

December 7, 2022

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
New York, New York 10007

Re: ***United States v. William Jones***, 21 Cr. 505 (ER)

Dear Judge Ramos:

The Government writes, with the consent of defense counsel, to move to exclude time under the Speedy Trial Act until the date of the next conference, March 24, 2013.

On December 6, 2022, the Court granted the defendant's application to adjourn the December 9, 2022 conference. As noted in that application, the defense consents to an exclusion of time.

By way background, the defendant is charged with death-eligible offenses. On November 9, 2021, the Government requested a mitigation submission from defense counsel to assist the Government in its assessment of whether to seek the death penalty in this case. On August 17, 2022, the Government received the requested submission from defense counsel. On October 4, 2022, the Capital Case Section requested, pursuant to the applicable provisions of the Justice Manuel, a conference with defense counsel to consider the case. The CCS conference was scheduled for December 6, 2022, but has been adjourned at the defense's request.

The Government submits that the ends of justice served by the requested exclusion of time outweigh the best interests of the public and the defendant in a speedy trial, because such an exclusion will allow the defense to participate in the capital case process, continue its review of discovery, and otherwise prepare for trial.

Speedy trial time is excluded from December 9, 2022 until March 24, 2023, in the interest of justice.
SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: 12/7/2022
New York, New York

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

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